

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**RENEWAL of OPERATING PERMIT 96OPAD160**

ConocoPhillips Pipeline – Denver Terminal  
Adams County  
Source ID 0010015

Prepared by Lisa Clarke  
April 2007

**I. Purpose:**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued June 1, 1999, and expires on June 1, 2004. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the administrative modification application submitted February 10, 2006. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Description of Source**

This facility is a petroleum marketing and storage terminal and is classified under the Standard Industrial Classification 5171. Gasoline products, Kerosene Turbine Fuel (KTF), and Diesel fuel are delivered through a pipeline, stored, and distributed through tank trucks. The equipment at this facility includes storage tanks, loading rack, vapor combustion unit (VCU), and a soil vapor extraction system. Emissions also originate from tank cleaning activities, propane truck loading, equipment leaks, and portable maintenance flares (brought onsite to clear pipelines of fuel).

Based on the information provided in the administrative modification application, the 25 MMBtu/hr boiler previously at the site was removed from service and replaced with two natural-gas fired comfort boilers rated at 1.06 MMBtu/hr each.

These two boilers were added to the insignificant activity list.

The loading rack and the gasoline storage tanks (except T501) are equipped with a vapor combustion unit to control VOC and HAP emissions and has potential uncontrolled emissions of VOC over 100 tons/yr. Therefore, the loading rack and gasoline storage tanks are subject to the compliance assurance monitoring (CAM) requirements.

The facility is located at 3960 East 56<sup>th</sup> Avenue, Commerce City, Colorado in Adams County. The area in which the plant operates is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM<sub>10</sub>), ozone/VOC, and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM<sub>10</sub>, VOC, and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(I) of the Federal Clean Air Act. There are no affected states within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park.

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to update the potential to emit (PTE) due to modifications made to the permitted emission units at this facility in the previous modifications, and changes due to new emission factors. Emissions (in tons per year) at the facility are as follows:

Pollutant	Potential to Emit
NO <sub>x</sub>	40.35
CO	50.6
VOC	150.8
HAPS <sup>1</sup>	24 combined/9 single

<sup>1</sup> CPPL is a synthetic minor source for HAPS.

Potential to emit is based on permitted or requested emissions.

### **III. Discussion of Modifications Made**

#### **Source Requested Modifications**

The source requested three items:

1. Cancellation of the APEN associated with the 25 MMBtu/hr boiler.
2. Incorporation of the two new natural-gas fired boilers into the Operating Permit.

3. Name change of “Phillips Pipe Line Company” to “ConocoPhillips Pipe Line Company.”

### **Other Modifications**

The Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments. These changes are as follows:

#### **Section I - General Activities and Summary**

- Condition 6.1 was changed to delete unit E005, the 25 MMBtu/hr boiler.

#### **Section II - Specific Permit Terms**

##### **Section II.5: E005 – Boiler**

- Deleted section per removal of the boiler from service.

#### **Section III & IV**

- Language updated to current language.
- Section III – Condition 1 – Boiler removed from Specific Non-Applicable Requirements.

#### **Appendices**

- Appendices updated to current format.
- All instances referring to 25 MMBtu/hr boiler deleted.
- Appendix A: Two new natural-gas fired boilers added to Insignificant Activities List.